

**FATCA Reports
International Compliance Management
Model (ICMM)
Notifications User Guide**

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1 Receiving a FATCA Notification

A Notification is a “transmission” file archive that contains encrypted documents that are sent from the United States Internal Revenue Service (IRS) to a Foreign Financial Institution (FFI), direct reporting non-financial foreign entity (NFFE), or Host Country Tax Authority (HCTA) in response to the transmission of a FATCA Report submitted on the Intergovernmental FATCA XML Schema or the paper Form 8966. Notifications are sent from the IRS International Compliance Management Model (ICMM) system via the International Data Exchange Service (IDES). This document focuses on the meaning of each of the possible notifications and the steps that should be taken to address the issue(s) identified by the notification(s).

When the IRS sends a Notification, the International Data Exchange Service (IDES) will send an alert to the FFI, direct reporting NFFE, or HCTA that a file is ready for download. The alert correspondence will reference the “IDESTransmissionID” of the original transmission from the FFI, direct reporting NFFE, or HCTA.

Instructions on how to download an IRS ICMM notifications from IDES and how to process the elements contained in it are available in the *IDES User Guide*, available on the [IRS IDES Homepage](#) and the [Notification Schema User Guide \(Publication 5189\)](#), respectively.

2 IRS FATCA Report Processing

Once you transmit an Intergovernmental FATCA XML package through IDES, the IRS ICMM system will receive an alert from IDES notifying it that the transmission is available and will then attempt to download and process the file in two stages:

1. **File-level Processing**, in which the system will download and perform various actions on received files to assess the overall integrity of the file and to check for file level errors. Files passing this stage will result in an informational notification that the file was processed successfully and will be processed further at the record level, while failures at this stage will generate error notifications transmitted to the sender of the file (through IDES).
2. **Record-level Processing** will decompose and evaluate individual FATCA account and pooled report records within files passing the file-level processing stage. This level of processing will occur at some point after the file has been successfully processed.

3 File-level Processing Activities – Detailed Description

There are a number of processing activities that occur in IRS’s file-level processing of the Intergovernmental FATCA XML files. It is important to note that these activities are **not** entirely lineal, sequential steps - for example, decryption and threat and virus detection all occur at multiple levels as the file is processed. Each activity will result in an error notification to the sender of the file if the processing activity is not completed or is unsuccessful. **The specific notification number, content and resolution instructions for each of the error notifications generated are included in Section 5 of this document.**

1. **Transmission Download:** When the IRS receives an alert from IDES that a transmission has been received from an FFI, direct reporting NFFE, or HCTA and is awaiting download, the IRS system will attempt to download the transmission from IDES. The alert provides the sender, received

timestamp, and other transmission information to IRS. The IRS will use this alert information to request download of the transmission from IDES. However, there may be circumstances that prevent this download from occurring when IRS initially receives the alert. For example, either system (IDES or the IRS system) may be down for scheduled maintenance or due to an unscheduled outage. The IRS system will regularly attempt to download a transmission after receiving the initial alert from IDES. If IRS is not able to download the transmission within seven days after initial receipt by IDES, IDES will delete the transmission. IRS will continue to attempt to download the transmission until IDES provides a response saying the transmission has been deleted. At this point, IRS will consider the transmission download step to have failed, and will issue an error notification to the sender (Notification NDW below) using transmission identification information provided in the original IDES alert when the transmission was received, allowing the sender to identify specifically which transmission has been lost. The remedy for the sender will be to upload the transmission to IDES again.

2. **File Decryption:** IRS will attempt to decrypt the AES key used to encrypt the payload using the valid IRS public key, available on IDES. IRS will then attempt to use the AES key to decrypt the payload file. If either the AES key or the payload cannot be decrypted in this manner, the IRS system will generate an error notification (Notification NDC below) to the sender using file identification information received from IDES stating that the file could not be decrypted. The remedy for the sender will be to first ensure the IRS public key in use on their encryption system is the valid IRS key that is available on IDES. The sender would then need to re-encrypt the digitally-signed and compressed plain text version of the referenced file with a new AES key, encrypt the new AES key with the valid IRS public key and upload a new transmission containing the file to IDES.
3. **File Decompression:** Since the payload is compressed, IRS must then decompress the payload file. The IDES User Guide provides a list of recommended compression tools. While other tools may be used, the compression method must be recognized by one of the recommended tools for the file to be successfully decompressed by our system. If the decompression fails, IRS will issue an error notification (Notification NDP below) to the sender using file identification information received from IDES stating that file could not be decompressed. In response, the sender will need to re-compress the payload file using a recognized compression method and upload a new transmission containing the file to IDES.
4. **Digital Signature Check:** After decompressing the payload file, IRS will attempt to verify the digital signature. The digital signature should have been generated by the sender of the file and proves that a) a FATCA file was sent by a FATCA partner (FFI, direct reporting NFFE, or HCTA) and b) the FATCA file was not altered or corrupted during compression, encryption, decryption or decompression processes and not altered or corrupted during transmission to or from IDES. If the digital signature cannot be verified as belonging to the sender, IRS will issue an error notification (Notification NSC below) to the sender using file identification information received from IDES stating that the digital signature on the file could not be verified. The remedy for the sender will be to re-sign the file using the procedures provided in the IDES User Guide, re-compress, and upload a new transmission containing the file to IDES.
5. **Threat Scanning:** Files will be scanned for non-virus threats that could pose security threats to the IRS IT environment after each processing stage involving the archive and the enclosed files. These processing stages include “unzipping” the transmission archive, decryption of the AES key file, and decryption and decompression of the signed XML payload file. Potential threats include, but are not limited to the following:

- prohibited characters ((Apostrophe (')), Double Dash (--)) and Hash (#))
- hyperlinks
- executable files
- JavaScript components
- compressed archive files

If any such items are detected, IRS will reject the file, send an error notification (Notification NTD below) to the sender of the file, and stop further processing of the file. The error notification will inform the sender that a non-virus threat was found, but will not identify the specific type of threat. The sender will need to ensure any prohibited characters are removed from both the payload and sender metadata files; re-create the transmission, using up-to-date antivirus software to scan for and remove any viruses and/or threats at each of the processing steps; then upload the clean transmission to IDES.

6. **Virus Scanning:** Files will also be checked for known viruses after each processing stage. If a virus is found, IRS will reject the file, send an error notification (Notification NVS below) to the sender of the file, and stop further processing of the file. The error notification will inform the sender that a virus was found on the file, but will not identify the specific virus. The sender will need to re-create the transmission, using up-to-date antivirus software to scan for and remove any viruses and/or threats at each of the processing steps, then upload the clean transmission to IDES.
7. **Schema Validation:** Once a file has been decrypted, decompressed, validated and found to contain no cyber security threats, IRS will determine whether it is a) a properly formed XML file (vs. a picture, Word document, or other file type) and b) that it is valid against the FATCA XML schema. This validation step ensures that the file structure conforms to the structure of the schema (e.g., data elements and sub-elements possess the proper relationships and data field contents conform to the schema specification). Both of these checks have a pass/fail outcome. If a file fails either of these checks, IRS will reject the file, send an error notification (Notification NSV below) to the sender of the file, and stop further processing of the file. The error notification will inform the sender that the file not a valid FATCA XML file, but will not identify the specific problem or error within the validation process that was encountered.
8. **Specific Schema Field Value Validations:** After the file passes schema validation, IRS will then run the following field-specific checks:
 - the MessageRefID field, to ensure it contains at least one non-blank, alphanumerical character and is within the 200 character limit established for the field
 - the MessageRefID field, to ensure it is not duplicative with any other file the sender has submitted
 - the DocRefID fields (note: a file may include multiple DocRefID fields), to ensure they contain at least one non-blank, alphanumerical character and are within the 200 character limit established for the field.

While a file containing a duplicative value for MessageRefID and/or one or more blank spaces for MessageRefID / DocRefID would pass schema validation, it would cause significant issues with business rules for unique file/record identification and file/record processing and therefore cannot be accepted by IRS. If these validation checks fail, IRS will generate the appropriate error notification (NMR, NDM, or NDR below, respectively) informing the sender of the invalid data. The

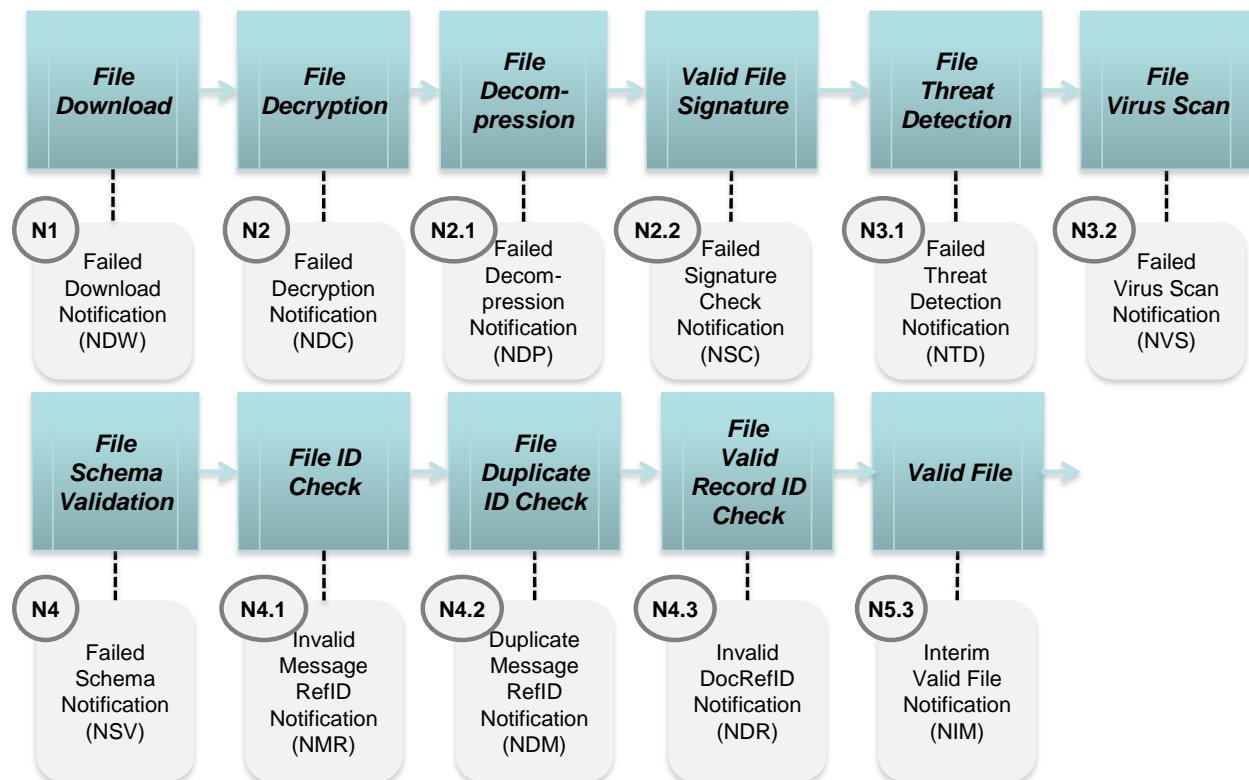
sender will need to correct the invalid field(s) and upload a new transmission containing the file to IDES.

Interim Valid File Notification - If file processing successfully completes these steps, you will receive a notification that the file has been received and its format validated, but that individual records have not yet been processed and you will receive additional notification once these records are processed as to the outcome of the record-level processing. This “valid file” notification is Notification NIM (Interim Valid File Notification).

4 IRS File-Level Processing Notification Overview

The possible file-level processing activities and resulting notifications are summarized in Figure 4-1 below:

Figure 4-1 File-Level Processing Activities and Accompanying Notifications*



* For each file transmission, the sender will receive either an error notification (N1 through N4.3) OR N 5.3 interim valid file notification

4.1.1 Sample Error Notification

The following Figure 4-2 is an example of what the Error Notifications will look like in XML; this specific example is for the failed decryption (NDC) case:

Figure 4-2: FATCA Notification Example (Failed Decryption)

```
<?xml version="1.0" encoding="UTF-8" ?>
- <!-- Sample XML file generated by XMLSpy v2014 rel. 2 (http://www.altova.com) -->
- <n1:FATCAFileErrorNotification xmlns="urn:fatca:fatcanotificationbase"
  xmlns:n1="urn:fatca:fatcafileerrornotification" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
  version="1.4">
- <FATCANotificationHeaderGrp>
  <FATCANotificationCreateTs>2014-11-14T00:00:00Z</FATCANotificationCreateTs>
  <FATCANotificationRefId>Notif12345</FATCANotificationRefId>
  <FATCANotificationCd>NDC</FATCANotificationCd>
  <FATCAEntitySenderId>000000.00000.TA.840</FATCAEntitySenderId>
  <FATCAEntityReceiverId>S519K4.99999.SL.392</FATCAEntityReceiverId>
  <CopiedToFATCAEntityId>000000.00000.TA.392</CopiedToFATCAEntityId>
  <ContactInformationTxt>URL will be provided in the actual notification
</ContactInformationTxt>
</FATCANotificationHeaderGrp>
- <OriginalFileMetadataGrp>
  <IDESTransmissionId>a7c6363de36f4c2192856b4d3283747c</IDESTransmissionId>
  <IDESSendingTs>2014-11-10T00:00:00Z</IDESSendingTs>
  <OriginalIDESTransmissionId>c646151fe7ed4bd696efc8efe49226ac</OriginalIDESTransmissionId>
  <SenderFileId>SenderFile1</SenderFileId>
  <UncompressedFileSizeKBQty>100000</UncompressedFileSizeKBQty>
</OriginalFileMetadataGrp>
  <NotificationContentTxt>The IRS could not decrypt the referenced file following download from IDES. Please do not
  submit a request to correct, amend or void any of the records in this file until you receive a notification that this file
  has been received as valid.
  For more information on this notification, please see: URL will be provided in the actual notification
.</NotificationContentTxt>
- <ActionRequestedGrp>
  <ActionRequestedTxt>Resubmit file.</ActionRequestedTxt>
  <ActionRequestedDueDateTxt>Your organization's due date for filing Form 8966.</ActionRequestedDueDateTxt>
</ActionRequestedGrp>
  <HCTATreatyStampTxt>This information is furnished under the provisions of an income tax treaty or tax information
  exchange agreement (TIEA) with a foreign government, its use and disclosure must be governed by the provisions of
  that treaty or TIEA.</HCTATreatyStampTxt>
</n1:FATCAFileErrorNotification>
```

The notification will inform you of which file had the processing error, the type of error encountered, and what to do about the error, as well as provide a link to additional resources on irs.gov where you can find more information on the type of error encountered and the steps required for resolution.

4.1.2 Notification Content

The key data elements in a FATCA Notification are described below:

- Notification Timestamp: the time and date that the notification was generated
- Notification Reference ID: a unique identifier for the notification created by the IRS system
- Notification Code: a 3-letter mnemonic indicating the type of notification
- Sender ID: IRS's FATCA Entity identifier (000000.00000.TA.840)
- Receiver ID: FATCA Entity Identifier of receiving entity (FFI, direct reporting NFFE, or HCTA)
- "Copy to" FATCA entity ID: FATCA Entity Identifier of HCTA or FFI receiving a notification copy

- **Contact Information Text:** (included on error notifications only) provides a URL to a web page with error notification FAQs, links to supporting information, and contact email addresses and phone numbers for IRS Error Notification technical support
- **Notification Content Text:** a brief description of the reason for the notification
- **Action requested:** a brief description of what the recipient of the notification must do next
- **Action requested by date:** the due date for the action (typically this will be the filing date for Form 8066)
- **HCTA treaty stamp:** a brief statement that exchanged data referenced in the notification is covered by terms of a tax treaty (the specific language will depend on the jurisdiction of the FFI).

5 Specific Notification Explanations and Resolution Instructions by Notification

The specific contents, meaning, and recommended resolution steps for each of the file-level processing notifications are as follows. You can easily identify the specific notification you received by the 3-letter code, designated in the XML as “FATCANotificationCd” in your notification and identified both in parentheses in the Section Header and the first line of the “Notification Contents” in the notification-specific sections that follow.

5.1 FATCA Notification Code NDW: Failed Download

Notification Contents	<p>Notification Code: NDW</p> <p>Notification Content: The IRS could not download the referenced file that had been posted to IDES. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: <u>(URL will be provided in the actual notification)</u>.</p> <p>Action Requested: Please repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp (where applicable): "This information is furnished under the provisions of an income tax treaty or tax information exchange agreement (TIEA) with a foreign government, its use and disclosure must be governed by the provisions of that treaty or TIEA."</p>
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Cause of Problem	<ul style="list-style-type: none"> You successfully uploaded the transmission with the IDES Sender File ID and IDES Transmission ID to IDES. The IRS could not download the transmission before expiration of the 7 day IDES retention period. This may have been the result of an outage between IDES and the IRS, but did not involve any system or transmission components on your end. However, as a result the transmission is no longer available in IDES for download.
Potential Resolution	<ul style="list-style-type: none"> Because the transmission is no longer present on IDES, you will need to upload the transmission referenced by the listed IDES Sender's File ID and IDES Transmission ID in the error notification again. Please ensure that the IRS encryption key you used for the initial transmission has not changed. If it has, please re-encrypt the plain text version of the file you are sending with the new IRS key, and upload this new encrypted transmission to IDES. The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> IRS IDES Homepage IDES (vendor link TBD) Form 8966 instructions (including electronic filing instructions)
FAQs	<ol style="list-style-type: none"> <i>What could have prevented the IRS from downloading this transmission?</i> The IRS automatically downloads transmissions from IDES after receiving an alert from IDES that a transmission is available for download. We do not divulge the exact cause or reason for the failure of the automated process, but a system failure or outage on either side of the IRS-IDES connection led to the failure to download. <i>What do I need to do as a result of this notification?</i> Please upload the referenced transmission to IDES again by the due date that pertains to your organization, which is included in the notification body. The IRS will be notified when the transmission is available, and will download it at that time. <i>Why can't the IRS download the transmission now?</i> Because IDES automatically deletes transmissions that are not downloaded within seven days of upload, your transmission is no longer available on IDES. You must upload the transmission to IDES again to satisfy FATCA requirements. Please refer to the <i>IDES User Guide</i>, available on the IRS IDES Homepage, if you have any questions on how to prepare and upload transmissions to IDES. The IRS will be notified by IDES when your transmission is available, and will download it at that time. <i>Was there a problem with the contents of my file?</i> The IRS has not been able to process your file, so we cannot provide any feedback at this time on whether it is valid or not. After we have downloaded your transmission from IDES, we will process it and notify you of the results, including whether the file was successfully processed or if any additional errors were identified.

5.2 FATCA Notification Code NDC: Failed Decryption

Notification Contents	<p>Notification Code: NDC</p> <p>Notification Content: The IRS could not decrypt the referenced file following download from IDES. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: <u>(URL will be provided in the actual notification)</u>.</p> <p>Action Requested: Please re-encrypt the file with a valid key and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp (where applicable): "This information is furnished under the provisions of an income tax treaty or tax information exchange agreement (TIEA) with a foreign government, its use and disclosure must be governed by the provisions of that treaty or TIEA."</p>
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Cause of Problem	<ul style="list-style-type: none"> You are receiving this notice because the IRS was unable to decrypt your file after download from IDES. There are several situations that may have occurred: <ul style="list-style-type: none"> the AES key provided with the file was not the same as the AES key used to encrypt the payload the public IRS key used to encrypt the AES key was not valid the encryption settings were incompatible with the IRS decryption algorithm the payload and/or encrypted AES key file was changed or modified after encryption.
Potential Resolution	<ul style="list-style-type: none"> Ensure you have the valid IRS public encryption key on your system, downloaded from IDES. Please encrypt the digitally-signed and compressed payload of the referenced file with a new AES key and then encrypt the new AES key with the valid IRS public key. Ensure you are using the IRS recommended encryption settings and following all of the procedures and file naming conventions in the "Data Preparation for FATCA XML Report" section of the IDES User Guide, available on the IRS IDES Homepage. Insert the re-encrypted payload and AES key files and a new XML header in an archive to create the IDES transmission. Finally, upload the transmission to IDES following all additional procedures (see IDES User Guide, available on the IRS IDES Homepage) for transmission preparation and upload. The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> IRS IDES Homepage IDES (vendor link TBD) Form 8966 instructions (including electronic filing instructions)
FAQs	<ol style="list-style-type: none"> Which specific decryption step failed? For security reasons the IRS does not disclose which situation caused the decryption failure. What key should I use to encrypt my files? Please follow the procedures in the IDES User Guide, available on the IRS IDES Homepage, and your local encryption software to generate a unique, one-time use AES-256 key. You should be using this unique, one-time use AES-256 key to encrypt your payload and the valid IRS public key available on IDES to encrypt the AES key. How can I determine if the IRS public key I am using is the correct version? The valid IRS key is available on IDES. Please see the IDES User Guide, available on the IRS IDES Homepage, for additional information and instructions on how to find and download the IRS public key for encrypting the AES key for transmission. How do I download the valid public key for the IRS? Please see the IDES User Guide, available on the IRS IDES Homepage, for additional information and instructions on how to find and download the IRS public key for encrypting the AES key for transmission to the IRS. Also, please consult the documentation for your encryption software application for assistance in importing the IRS public key into your system after downloading.

5.3 FATCA Notification Code NDP: Failed Decompression

Notification Contents	<p>Notification Code: NDP</p> <p>Notification Content: The IRS could not decompress the referenced file following download from IDES. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: <u>(URL will be provided in the actual notification)</u>.</p> <p>Action Requested: Please compress the file (before encrypting) and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp (where applicable): "This information is furnished under the provisions of an income tax treaty or tax information exchange agreement (TIEA) with a foreign government, its use and disclosure must be governed by the provisions of that treaty or TIEA."</p>
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Cause of Problem	<ul style="list-style-type: none"> You are receiving this notice because the IRS was unable to decompress your file after download from IDES. The decompression failure occurred either because the file was compressed using an unsupported compression tool or method, or because the file became corrupted after compression but before the AES encryption step.
Potential Resolution	<ul style="list-style-type: none"> Please recompress the digitally signed XML file using a ZIP compression tool and the standard Deflate compression method. Then create a new IDES transmission with this file, following all procedures (see the IDES User Guide, available on the IRS IDES Homepage) for IDES transmission preparation and upload. For a list of recommended tools and additional instructions for compression and file naming requirements, please refer to the IDES User Guide, available on the IRS IDES Homepage. The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> IRS IDES Homepage IDES (vendor link TBD) Form 8966 instructions (including electronic filing instructions)
FAQs	<p>9. <i>What tool should I be using to compress the file?</i> For a list of recommended tools and additional instructions for compression, please refer to the IDES User Guide, available on the IRS IDES Homepage.</p>

5.4 FATCA Notification Code NSC: Failed Signature Check

Notification Contents	<p>Notification Code: NSC</p> <p>Notification Content: The IRS could not validate the digital signature on the referenced file following download from IDES. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: <u>(URL will be provided in the actual notification)</u>.</p> <p>Action Requested: Please re-sign the file with the owner's private key using procedures provided on the IDES website and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp (where applicable): "This information is furnished under the provisions of an income tax treaty or tax information exchange agreement (TIEA) with a foreign government, its use and disclosure must be governed by the provisions of that treaty or TIEA."</p>
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Cause of Problem	<ul style="list-style-type: none"> You are receiving this notice because the IRS could not validate the digital signature on the payload file with your organization's valid public key on IDES.
Potential Resolution	<ul style="list-style-type: none"> Please re-sign the file using the specific instructions for signing the XML file in the "Data Preparation for FATCA XML Report" section of the IDES User Guide, available on the IRS IDES Homepage, as well as the procedures for your local encryption software package. Then recreate and upload the transmission to IDES following all additional procedures (see the IDES User Guide, available on the IRS IDES Homepage) for transmission preparation and upload. The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> IRS IDES Homepage IDES (vendor link TBD) Form 8966 instructions (including electronic filing instructions)
FAQs	<p>10. How do I digitally sign the file? Please follow the procedures for your local encryption software and for IDES. See the IDES User Guide, available on the IRS IDES Homepage, and your local encryption software for instructions on how to apply the digital signature.</p>

5.5 FATCA Notification Code NTD: Failed Threat Scan

Notification Contents	<p>Notification Code: NTD</p> <p>Notification Content: The IRS detected one or more potential security threats within the decrypted version of the referenced file following download from IDES. Such threats include but are not limited to hyperlinks, Java script, and executable files. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: <u>(URL will be provided in the actual notification).</u></p> <p>Action Requested: Please scan the file for known threats and viruses, remove all detected threats and viruses prior to encryption and re-encrypt and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp (where applicable): "This information is furnished under the provisions of an income tax treaty or tax information exchange agreement (TIEA) with a foreign government, its use and disclosure must be governed by the provisions of that treaty or TIEA."</p>
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Cause of Problem	<ul style="list-style-type: none"> • The IRS detected one or more security threats or prohibited characters embedded in the decrypted version of the payload and/or Sender Metadata files. We cannot accept files with embedded security threats or prohibited characters. • Note that the Apostrophe ('), Double Dash (--) and Hash (#) characters are prohibited by IRS as they could pose a security threat. (For a full list of character restrictions, see FATCA XML Schema Best Practices for Form 8966). As these characters would not be detected by an antivirus product, you will need to take other measures to ensure these characters are not present in any of your files. • The IRS scans each transmission archive file and all files contained in the archive for viruses and other threats after each processing stage involving the archive and the enclosed files. These processing stages include “unzipping” the transmission archive, decryption of the AES-key file, and decryption and decompression of the signed XML payload file. • One of these scans detected a non-virus security threat, which triggered this notification.
Potential Resolution	<ul style="list-style-type: none"> • Please remove all prohibited characters from the payload and Sender Metadata files, then rebuild the full transmission by following all additional procedures (see the IDES User Guide, available on the IRS IDES Homepage) and scanning for viruses and other security threats with up-to-date antivirus software at each step in the process (digital signature, compression, encryption of the payload and AES key files, creation of the IDES metadata file, creation of the full transmission files). • Upload the full transmission to IDES. • The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> • None identified
FAQs	<p>11. What threat did the IRS detect? For security reasons the IRS does not disclose specific threats identified on electronic communications received from third parties, or what we use to identify these threat. However, these threats can include items such as:</p> <ul style="list-style-type: none"> • prohibited characters (Apostrophe ('), Double Dash (--) and Hash (#) • hyperlinks embedded within received files • JavaScript components • executable files (e.g., .exe files) • compressed archive files <p>These items should not be part of any submitted file.</p> <p>12. What antivirus product should I use to clean my file? As prohibited characters would not be detected by an antivirus product, you will need to take other measures (e.g., review with an XML or text editor) to ensure these characters are not present in any of your files. Generally, any up-to-date and widely accepted antivirus software product should be capable of finding any other threat the IRS detected. The IRS uses such products for virus and threat detection and removal. However, the IRS does not recommend the use of a particular product for this purpose.</p> <p>13. What should I do if I need help with scanning my file for threats? It is the sender's responsibility to ensure all files are virus and threat free and comply with all IRS requirements and restrictions. Please contact your local IT support staff for assistance with this step, or consult the IDES User Guide and documentation provided by your antivirus software provider. The IRS cannot provide technical assistance with this process.</p>

5.6 FATCA Notification Code NVS: Failed Virus Scan

Notification Contents	<p>Notification Code: NVS</p> <p>Notification Content: The IRS detected one or more known viruses within the decrypted version of the referenced file following download from IDES. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: <u>(URL will be provided in the actual notification).</u></p> <p>Action Requested: Please scan the file for known threats and viruses, remove all detected threats and viruses prior to encryption, and re-encrypt and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp (where applicable): "This information is furnished under the provisions of an income tax treaty or tax information exchange agreement (TIEA) with a foreign government, its use and disclosure must be governed by the provisions of that treaty or TIEA."</p>
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Cause of Problem	<ul style="list-style-type: none"> • The IRS detected one or more computer viruses embedded in the decrypted version of the file. We cannot accept a file with viruses present. • The IRS scans each transmission archive file and all files contained in the archive for viruses and other threats after each processing stage involving the archive and the enclosed files. These processing stages include “unzipping” the transmission archive, decryption of the AES key file, and decryption and decompression of the signed XML payload file. • One of these scans detected a virus, which triggered this notification.
Potential Resolution	<ul style="list-style-type: none"> • Rebuild the full transmission for this payload file by following all procedures (see the IDES User Guide, available on the IRS IDES Homepage) and scanning for viruses and other security threats with up-to-date antivirus software at each step in the process (digital signature, compression, encryption of the payload and AES key files, creation of the IDES metadata file, creation of the full transmission files). • Upload the full transmission to IDES. • The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> • None identified
FAQs	<p>14. What virus did the IRS detect? For security reasons the IRS does not disclose specific viruses identified on electronic communications received from third parties, or what we use to identify viruses. However, the viruses we detect are typically found using up-to-date commercial anti-virus products.</p> <p>15. What antivirus product should I use to clean my file? Generally, any up-to-date and widely accepted antivirus software product should be capable of finding the virus the IRS detected. The IRS uses such products for virus and threat detection and removal. However, the IRS does not recommend the use of a particular product for this purpose.</p> <p>16. What should I do if I need help with scanning my file for viruses? It is the sender’s responsibility to provide clean files, and to ensure all files are virus free. Please contact your local IT support staff for assistance with this step, or consult the documentation provided by your antivirus software provider. The IRS cannot provide technical assistance with this process.</p>

5.7 FATCA Notification Code NSV: Failed Schema Validation

Notification Contents	<p>Notification Code: NSV</p> <p>Notification Content: The referenced file failed validation against the Intergovernmental FATCA XML Schema. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: <u>(URL will be provided in the actual notification).</u></p> <p>Action Requested: Please re-validate the file against the Intergovernmental FATCA XML Schema, resolve any validation errors, and re-encrypt and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp (where applicable): "This information is furnished under the provisions of an income tax treaty or tax information exchange agreement (TIEA) with a foreign government, its use and disclosure must be governed by the provisions of that treaty or TIEA."</p>
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Cause of Problem	<ul style="list-style-type: none"> The referenced file has one or more XML schema validation errors.
Potential Resolution	<ul style="list-style-type: none"> Please revalidate the referenced file against the FATCA XML Schema (IRS Publication 5124 available at FATCA XML Schema) to identify and resolve the specific validation issue. Use this inspected file to recreate an IDES transmission and upload to IDES following all procedures (see the IDES User Guide, available on the IRS IDES Homepage) for transmission preparation and upload. The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> IRS Publication 5124 (FATCA XML Schema) Form 8966 instructions (including electronic filing instructions) IRS IDES Homepage
FAQs	<p>17. <i>What was the specific validation error that the IRS detected on my file?</i> There were one or more validation errors identified on your file. The IRS does not provide specific error information for this type of file error, but these errors can be identified by using any widely accepted XML validation tool.</p>

5.8 FATCA Notification Code NMR: File Contains Invalid MessageRefID

Notification Contents	<p>Notification Code: NMR</p> <p>Notification Content: The referenced file has an invalid MessageRefID field consisting of all blank characters or exceeding 200 characters. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: <u>(URL will be provided in the actual notification).</u></p> <p>Action Requested: Please replace any all-blank character MessageRefID field values with non-blank entries, and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp (where applicable): "This information is furnished under the provisions of an income tax treaty or tax information exchange agreement (TIEA) with a foreign government, its use and disclosure must be governed by the provisions of that treaty or TIEA."</p>
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Cause of Problem	<ul style="list-style-type: none"> The MessageRefID schema field in the referenced file consists of one or more blank characters or exceeds 200 characters in length. This field should be a unique identifier for a report file and is required to be at least one, but no more than 200, alphanumeric characters, and cannot be all blank characters.
Potential Resolution	<ul style="list-style-type: none"> Please correct the file by including a unique, valid alphanumeric character string in the MessageRefID field per the FATCA XML Schema User Guide (IRS Publication 5124 available at FATCA XML Schema) that does not consist of all blanks and that is no more than 200 characters in length. Use this file to recreate an IDES transmission and upload to IDES following all procedures (see IDES User Guide, available on the IRS IDES Homepage) for transmission preparation and upload. The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> IRS Publication 5124 (FATCA XML Schema) Form 8966 instructions (including electronic filing instructions) IRS IDES Homepage
FAQs	<p>18. Why was this issue not identified by my XML validation tool? The FATCA XML Schema User Guide (IRS Publication 5124 available at FATCA XML Schema) states that the MessageRefID should be a unique identifying number (created by the sender) that identifies the particular message being sent. Although a MessageRefID consisting of all blanks is valid against the schema, the IRS does not consider a blank MessageRefID to be unique. Furthermore, we have limited the MessageRefID and DocRefID fields to 200 characters. We require non-blank MessageRefIDs and DocRefIDs that are no more than 200 characters in length in order to be able to accept your file.</p>

5.9 FATCA Notification Code NDM: File Contains Duplicate MessageRefID

Notification Contents	<p>Notification Code: NDM</p> <p>Notification Content: The referenced file has a duplicate MessageRefID value that was received on a previous file. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: <u>(URL will be provided in the actual notification).</u></p> <p>Action Requested: Please replace the MessageRefID field value with a unique value (not containing all blanks), and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp (where applicable): "This information is furnished under the provisions of an income tax treaty or tax information exchange agreement (TIEA) with a foreign government, its use and disclosure must be governed by the provisions of that treaty or TIEA."</p>
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Cause of Problem	<ul style="list-style-type: none"> The MessageRefID schema field in the referenced file is duplicative of another file you have submitted. This field should be a unique identifying number for a report file and is required to be a string of at least one alphanumeric character.
Potential Resolution	<ul style="list-style-type: none"> Please correct the file by including a unique, valid alphanumeric character string in the MessageRefID field per the FATCA XML Schema User Guide (IRS Publication 5124 available at FATCA XML Schema) that does not consist of all blanks. Use this file to recreate an IDES transmission and upload to IDES following all procedures (see IDES User Guide, available on the IRS IDES Homepage) for transmission preparation and upload. The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> IRS Publication 5124 (FATCA XML Schema) Form 8966 instructions (including electronic filing instructions) IRS IDES Homepage
FAQs	<p>19. Why was this issue not identified by my XML validation tool? While your file is in the valid XML format, comparison of MessageRefIDs takes place outside of XML validation. The FATCA XML Schema User Guide (IRS Publication 5124 available at FATCA XML Schema) states that the MessageRefID should be a unique identifying number (created by the sender) that identifies the particular message being sent. The IRS cannot accept more than one file from the same sender with the same MessageRefID.</p>

5.10 FATCA Notification Code NDR: File Contains Invalid DocRefID

Notification Contents	<p>Notification Code: NDR</p> <p>Notification Content: The referenced file has an invalid DocRefID field consisting of all blank characters or exceeding 200 characters. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: <u>(URL will be provided in the actual notification).</u></p> <p>Action Requested: Please replace any DocRefID field values containing all-blank characters with non-blank entries, and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp (where applicable): "This information is furnished under the provisions of an income tax treaty or tax information exchange agreement (TIEA) with a foreign government, its use and disclosure must be governed by the provisions of that treaty or TIEA."</p>
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Cause of Problem	<ul style="list-style-type: none"> One or more records with DocRefID schema fields in the submitted file consist of one or more blank characters or exceed 200 characters in length. These fields should contain the unique identifier of the specific account or pooled report record they reference and are required to be at least one, but no more than 200, alphanumeric characters, and cannot be all blank characters.
Potential Resolution	<ul style="list-style-type: none"> Please correct the file by including valid alphanumeric character strings in all DocRefID fields per the FATCA XML Schema User Guide (IRS Publication 5124 available at FATCA XML Schema) that do not consist of all blanks and that are no more than 200 characters in length. Use this file to recreate an IDES transmission and upload to IDES following all procedures (see <i>IDES User Guide</i>, available on the IRS IDES Homepage) for transmission preparation and upload. The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> IRS Publication 5124 (FATCA XML Schema) Form 8966 instructions (including electronic filing instructions) IRS IDES Homepage
FAQs	<p>20. <i>Why was this issue not identified by my XML validation tool?</i> The FATCA XML Schema User Guide (IRS Publication 5124 available at FATCA XML Schema) states that the DocRefID data element should contain the unique identifier of the specific account or pooled report it references. Although a DocRefID consisting of all blanks is valid against the schema, the IRS does not consider a blank DocRefID to be unique. Furthermore, we have limited the MessageRefID and DocRefID fields to 200 characters. We require non-blank MessageRefIDs and DocRefIDs that are no more than 200 characters in length in order to be able to accept your file.</p>

5.11 FATCA Notification Code NIM: Interim Valid File Notification

Notification Contents	<p>Notification Code: NIM</p> <p>Notification Content: The IRS has determined that the referenced file is in a valid format. At this time individual records have not yet been processed. Further communication will be sent if errors are detected during record processing. This is for information purposes only, and requires no response or action by you.</p> <p>IRS Processing Data for Received File: File Type: <new, revised, duplicate> # of Records in File: <number> # of Account Reports in File: <number> # of Pooled Reports in File: <number> # of Financial Institutions in File: <number></p> <p>HCTA Model 1/Model 2 Treaty Stamp (where applicable): “This information is furnished under the provisions of an income tax treaty or tax information exchange agreement (TIEA) with a foreign government, its use and disclosure must be governed by the provisions of that treaty or TIEA.”</p>
Cause of Problem	<ul style="list-style-type: none"> • None
Potential Resolution	<ul style="list-style-type: none"> • None
Other Links/ Resources	<ul style="list-style-type: none"> • None
FAQs	<p>21. <i>What does this notification mean?</i> The IRS has received and successfully completed the first phase of processing your file. At this time, there is no action for you to take with respect to this notification. Individual records in this file will be processed further at a later date, and you will be notified if any errors are encountered and if you need to take any further action.</p>

Appendix A: Glossary of Terms and Acroynms

Acronym	Definition
AES	Advanced Encryption Standard
FATCA	Foreign Account Tax Compliance Act
FFI	Foreign Financial Institution
GIIN	Global Intermediary Identification Number
HCTA	Host Country Tax Authority
IDES	International Data Exchange Service
IRS	Internal Revenue Service
XML	Extensible Markup Language